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**From:** Distler, Ken [Kenneth\_Distler@kindermorgan.com]  
**Sent:** 9/9/2019 8:59:53 PM  
**To:** Topinka, Natalie [topinka.natalie@epa.gov]  
**Subject:** background info...RE: Request for Extension to 2-Year Leak Repair Requirement under NSPS OOOOa - Compressor Station 312

Hi Natalie, for your consideration....

For Station 312

The centrifugal compressor at 312 utilizes dry seal technology rather than wet seals. So, the centrifugal compressor at Compressor Station 312 does not meet the description in 60.5365a(b) and is exempt from the provisions of Subpart OOOOa.

The leak was associated with a connector that is attached to the station 312 cooling unit for the gas being compressed by the station. This is our interpretation of the OOOOa station 312 applicability:

Pursuant to 40 CFR 60.5365a(j), another affected facility type subject to Subpart OOOOa is the collection of fugitive emission components at a compressor station. Compressor Station 312 meets the definition of "compressor station" in 40 CFR 60.5430a. Compressor Station 312 will have fugitive emission components present throughout the facility. As such, the fugitive emission components at Compressor Station 312 are subject to the applicable provisions of Subpart OOOOa.

So the provision 60.5397a for fugitive emissions standards is applicable. Unfortunately the provision mentioned below isn't found in 60.5397a.

Ken

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**From:** Distler, Ken  
**Sent:** Monday, September 9, 2019 2:27 PM  
**To:** 'Topinka, Natalie'; Bennett, Dee  
**Subject:** RE: Request for Extension to 2-Year Leak Repair Requirement under NSPS OOOOa - Compressor Station 312

Hello Natalie,

I handle the air permitting/compliance activities for NGPL in IL.

We had submitted the request to the ILL EPA prior to the regulatory 2-year deadline of August 22. After receiving verbal notification, from the ILL EPA on Aug 19 that the request was rejected, NGPL decided to blowdown and affect repair prior to Aug 20<sup>th</sup> in order to avoid exceeding the 2-year repair- regulatory deadline.

However,

As applicability of this rule becomes more common, this type of scenario is likely to occur in the future, I would like to pursue your thoughts in the event a similar situation arises....

I'll give you a call to discuss...ken

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**From:** Topinka, Natalie [mailto:topinka.natalie@epa.gov]  
**Sent:** Monday, September 9, 2019 1:27 PM  
**To:** Bennett, Dee

**Cc:** Distler, Ken

**Subject:** Re: Request for Extension to 2-Year Leak Repair Requirement under NSPS OOOOa - Compressor Station 312

[This email message was received from the Internet and came from outside of Kinder Morgan]

Hello Dee,

I just left you a voicemail regarding the above-referenced request. I have one initial question: is the location of the leak also considered part of a closed-vent system associated with a centrifugal compressor or reciprocating compressor affected facility? If so, the scenario you describe, where the emissions from a blowdown would be greater than the emissions from letting the leak continue, is already contemplated, and delay of repair is allowed.

See the select citations from NSPS OOOOa:

*60.5416a(b) No detectable emissions test methods and procedures. If you are required to conduct an inspection of a closed vent system or cover at your centrifugal compressor, reciprocating compressor, or pneumatic pump affected facility as specified in paragraphs (a)(1), (2), or (3) of this section, you must meet the requirements of paragraphs (b)(1) through (13) of this section.*

*(b)(10) Delay of repair. Delay of repair of a closed vent system or cover for which leaks or defects have been detected is allowed if the repair is technically infeasible without a shutdown, or if you determine that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. You must complete repair of such equipment by the end of the next shutdown.*

*60.5397a(h) Each identified source of fugitive emissions shall be repaired or replaced in accordance with paragraphs (h)(1) and (2) of this section. For fugitive emissions components also subject to the repair provisions of §§60.5416a(b)(9) through (12) and (c)(4) through (7), those provisions apply instead to those closed vent system and covers, and the repair provisions of paragraphs (h)(1) and (2) of this section do not apply to those closed vent systems and covers.*

If the above provisions do not apply to the scenario at Compressor Station 312, I will need to look into what regulatory authority may consider an extension of time. Let me know when is a good time to discuss the request.

Thanks,

Natalie

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